

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JOSEPH ROGERS, DEBRA JONES
STEVENSON, FRANK GARRIDO, TAYLOR
ARMIGER, and GWENDOLYN THOMPSON,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

ASSURANCE IQ, LLC,

Defendant.

Case No. 2:21-cv-00823-TL

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER FOR LEAVE
TO FILE SECOND AMENDED
COMPLAINT**

NOTE ON MOTION CALENDAR:
April 26, 2022

Plaintiffs Joseph Rogers, Debra Jones Stevenson, Frank Garrido, Taylor Armiger, and Gwendolyn Thompson (“Plaintiffs”), with the consent of counsel for Defendant pursuant to Fed. R. Civ. P. 15(a)(2), hereby move this Court, in accordance with Local Civil Rule 15, for leave to file a Second Amended Complaint. A redline showing how the proposed Second Amended Complaint differs from Plaintiff’s First Amended Complaint filed on November 4, 2021 (Dkt. No. 35) is attached hereto as Exhibit A.

The purpose of the amendment is to (a) add as a defendant Boomsourcing, Inc. (“Boomsourcing”), who physically dialed the calls for Defendant Assurance IQ, LLC (“Assurance IQ”) to a large number of putative class members, including four of the plaintiffs,

(b) making vicarious liability allegations with respect to Boomsourcing and the other vendor involved in contacting the plaintiffs, and (c) correcting the phone number pled for Ms. Stevenson.

Counsel for Defendant have stipulated to the amendment. Accordingly, Plaintiffs request that this Court enter an order granting Plaintiffs leave to file their Second Amended Complaint in the form attached hereto as Exhibit A.

Defendant explicitly reserves all rights and defenses as they dispute the allegations contained in the proposed Second Amended Complaint.

RESPECTFULLY SUBMITTED AND DATED this 26th day of April, 2022.

/s/ Samuel J. Strauss

Samuel J. Strauss, WSBA #46971
TURKE & STRAUSS LLP
613 Williamson St., Suite 201
Madison, Wisconsin 53703
Telephone: (608) 237-1775
Facsimile: (608) 509-4423
Email: sam@turkestrauss.com

/s/ John Du Wors

John Du Wors
NEWMAN DU WORS LLP
2101 Fourth Avenue, Suite 1500
Seattle, Washington 98121
Telephone: (206) 274-2800
Facsimile: (206) 274-2801
Email: john@newmanlaw.com

Anthony Paronich, *Admitted Pro Hac Vice*
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, Massachusetts 02043
Telephone: (617) 485-0018
Facsimile: (508) 318-8100
Email: anthony@paronichlaw.com

Mark A. Silver, *Admitted Pro Hac Vice*
Nathan L. Garroway, *Admitted Pro Hac Vice*
DENTONS US LLP
303 Peachtree Street NE, Suite 5300
Atlanta, GA 30308
Telephone: (404) 527-4000
Facsimile: (404) 527-4198
Email: mark.silver@dentons.com
Email: Nathan.garroway@dentons.com

Timothy J. Sostrin, *Admitted Pro Hac Vice*
KEOGH LAW, LTD.
55 W Monroe St., Suite 3390
Chicago, IL 60603
Telephone: (312) 726-1092
Facsimile: (312) 726-1093
Email: tsostrin@keoghlaw.com

Attorneys for Defendant

1 Andrew Heidarpour, *Admitted Pro Hac Vice*
2 HEIDARPOUR LAW FIRM, PLLC
3 1300 Pennsylvania Ave. NW, 190-318
4 Washington, DC 20004
5 Telephone: (202) 234-2727
6 Email: aheidarpour@hlfirm.com

7 *Attorneys for Plaintiffs*

8 **ORDER**

9 IT IS SO ORDERED.

10 Dated this 26th day of April 2022.

11 

12 Tana Lin
13 United States District Judge
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I, Samuel J. Strauss, hereby certify that on April 26, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

John Du Wors
NEWMAN DU WORS LLP
2101 Fourth Avenue, Suite 1500
Seattle, Washington 98121
Telephone: (206) 274-2800
Facsimile: (206) 274-2801
Email: john@newmanlaw.com

Mark A. Silver, *Admitted Pro Hac Vice*
Nathan L. Garroway, *Admitted Pro Hac Vice*
DENTONS US LLP
303 Peachtree Street NE, Suite 5300
Atlanta, GA 30308
Telephone: (404) 527-4000
Facsimile: (404) 527-4198
Email: mark.silver@dentons.com
Email: Nathan.garroway@dentons.com

Attorneys for Defendant

DATED this 26th day of April, 2022.

TURKE & STRAUSS LLP

By: /s/ Samuel J. Strauss, WSBA #46971
Samuel J. Strauss, WSBA #46971
Email: sam@turkestrauss.com
613 Williamson St., Suite 201
Madison, Wisconsin 53703
Telephone: (608) 237-1775
Facsimile: (608) 509-4423